

# Received & Inspected FEB 26 2014 FCC Mail Room

3901 North Louise Avenue

Sioux Falls, South Dakota 57107

February 26, 2014

Marlene H. Dortch, Esquire Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street SW Suite TW-A325 Washington, DC 20554

RE: Midcontinent Communications
Annual Customer Proprietary Network Information Certification
EB Docket No. 06-36

Dear Ms. Dortch:

Midcontinent Communications ("Midcontinent"), by its attorney, hereby submits its annual customer proprietary network information ("CPNI") certification. Please inform me if any questions should arise in connection with this filing.

Respectfully submitted,

Pat Mastel

Midcontinent Communications Corporate Counsel

Enclosure(s)

No. of Copies rec'd\_\_ List ABCDE

Over Fifty Years of Service



# Received & Inspected FEB 26 2014 FCC Mail Room

3901 North Louise Avenue Sioux Falls, South Dakota 57107

# Annual 47 C.F.F. § 64.2009(e) CPNI Certification

#### EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2013

Date filed: February 25, 2014

Name of company covered by this certification: Midcontinent Communications

Form 499 Filer ID: 802284

Name of signatory: Steven Grosser

Title of signatory: CFO

I, Steven Grosser, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceeding instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

Midcontinent Communications

Its Chief Financial Officer

By Midcontinent Communications Investor, LLC,

Managing Partner of Midcontinent Communications



# Received & Inspected FEB 26 2014 FCC Mail Room

3901 North Louise Avenue Sioux Falls, South Dakota 57107

## Midcontinent Communications CPNI Compliance Procedures

Midcontinent Communications policies and procedures to meet the guidelines of CPNI include:

# Marketing:

- The Vice President of Marketing approves all direct marketing to ensure compliance with the CPNI rules
- Marketing has safeguards to prevent cross product information sharing that would be in violation of CPNI rules
- · Marketing does not sell customer lists to outside sources

## Customer Service:

- Customer service has extensive training, as part of new hire training and on an annual basis, on the importance of customer confidentiality.
- Employees must sign an acknowledgement that they have been advised of and understand the importance of customer privacy every time they receive training on confidentiality.
- Customers must verify their personal account information before an employee can provide
  comments or take requests for any changes to an account. At a minimum, customers must
  provide their name, address and a password of their choice which may be the last four digits of
  their social security number or date of birth. For in-person requests, customers must present
  valid photo identification.
- Every entry into a customer account is tagged with the user name entering the account and the
  user is required to make comments on why the account has been opened
- Customer service representative interactions with customers are monitored for quality assurance, and the monitoring includes evaluation of compliance with privacy requirements.
- Employees have been trained on how to report security breaches.
- Customers that request call detail information by phone will be provided with that information
  only by mail to the address of record or via a return call to the telephone number of record for
  the account. Customers may obtain call detail information in person only after presenting valid
  photo identification.

# Order Processing/Provisioning:

Passwords are used to get into any of Midcontinent systems

- Every entry into a customer account is tagged with the user name entering the account
- Paper documents are scanned and stored electronically for safe keeping and paper copies are shredded

 Processes have been put into place to notify a customer when there has been a request to create or change the customer's address of record, password, back-up for forgotten passwords, or an online account

#### **Technicians**

- Employees have been trained on the need to protect customer CPNI
- Employees have been trained on how to report security breach

#### Management:

- Managers receive training on customer confidentiality on an annual basis
- Managers monitor and coach employees on maintaining customer confidentiality

#### **CPNI Security Breaches**

- Midcontinent employs a full time security person to monitor and proactively review network usage to minimize the threat of a security breach.
- Midcontinent notifies law enforcement of all breaches of its customers' CPNI pursuant to the procedures and timeframes described in Section 64.2011 of the FCC's rules.
- Midcontinent notifies customers of all breaches of their CPNI pursuant to the procedures and timeframes described in Section 64.2011 of the FCC's rules.
- Midcontinent maintains records of all discovered security breaches and of all notifications of security breaches made to law enforcement and customers for a period of two (2) years. The records include, to the extent possible, the dates of discovery and notification, detailed descriptions of the CPNI that was breached and the circumstances of the breach.

#### Other procedures to assure compliance with CPNI rules:

- Customer privacy is a part of all job descriptions.
- CPNI compliance processes are reviewed and updated annually or as regulations may require changes.
- Employee training on CPNI is done upon hiring and annually or as processes may change.
   Employees sign an acknowledgement at each training session.
- Compliance is monitored by managers listening to telephone conversations between employees and customers and/or monitoring data entry for any unusual activities or violation of CPNI rules.
- Compliance is part of an employee annual evaluation process. Compliance can affect employees' raises, promotions, or continued employment.
- Procedures have been put into place for dealing with third parties, including law enforcement.
- An Annual Notice is sent to all customers regarding Midcontinent's CPNI and Privacy Policy.